

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:15CR00445
	:	
Plaintiff,	:	
	:	JUDGE CHRISTOPHER A. BOYKO
vs.	:	
	:	
TAMELA M. LEE,	:	<u>DEFENDANT'S UNOPPOSED</u>
	:	<u>MOTION TO MODIFY CONDITIONS</u>
Defendant.	:	<u>OF BOND</u>

Defendant Tamela M. Lee, through counsel, respectfully moves this Court to issue an order modifying conditions of her bond. Ms. Lee requests that she be permitted have contact with Summit County employees for the limited purpose of allowing her to apply for Medicaid. Currently, Ms. Lee receives medical benefits through Summit County. Those benefits will no longer be in effect after January 10, 2016. Due to ongoing health problems, it is urgent that Ms. Lee takes immediate steps to get replacement coverage through Medicaid in place. Counsel has consulted with Assistant United States Attorneys Antoinette Bacon and Linda Barr who have indicated that the government does not oppose this motion.

For the foregoing reasons, Ms. Lee requests this Court modify her bond to include all previous terms and conditions of release except to allow her to have contact with Summit County employees regarding her medical benefits.

Respectfully submitted,

/s/Darin Thompson

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2016, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/Darin Thompson

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